

FILED

JUN 30 2021

UNITED STATES DISTRICT COURT

for the

Northern District of Oklahoma



10th Division

Mark C. McCartt, Clerk
U.S. DISTRICT COURT**21 CV - 269 TCK - JFJ**

1. Sharelle M Wilson

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

1. Tracey E Persons, 2. Deborrah Ludi Leitch

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Case No.

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No**COMPLAINT FOR VIOLATION OF CIVIL RIGHTS**

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Sharelle Wilson		
Address	3171 S 129th E Ave #2090		
	Tulsa	OK	74134
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	tulsa		
Telephone Number	9185218658		
E-Mail Address			

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	Deborrah Ludi Leitch		
Job or Title <i>(if known)</i>	Judge		
Address	500 S Denver Ave		
	Tulsa	OK	74103
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Tulsa		
Telephone Number	(918) 596-5420		
E-Mail Address <i>(if known)</i>			

☒ Individual capacity ☐ Official capacity

Defendant No. 2

Name	Tracey E Persons		
Job or Title <i>(if known)</i>	Attorney		
Address	616 S Boston Ave ste 307		
	Tulsa	Ok	74116
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Tulsa		
Telephone Number	9182057177		
E-Mail Address <i>(if known)</i>			

☒ Individual capacity ☐ Official capacity

Defendant No. 3

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐

Individual capacity

☐

Official capacity

Defendant No. 4

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐

Individual capacity

☐

Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐

Federal officials (a *Bivens* claim)

☒

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials? 42 U.S.C 1453d(k) 15 usc1692 e, [4 USC §110], 15 USC 78ff, 15 USC 1, 15 USC 1692j, 48 USC § 52.212-5

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

-
- D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.
SEE ATTACHED
-

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?
in a district court
-

- B. What date and approximate time did the events giving rise to your claim(s) occur?
June 21 @ 2pm
-

- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*
SEE ATTACHED
-

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Location information, trespass, violated rights of due process

Due to lack of communication from state employees, a default judgment was ordered. Plaintiff is unsure in his own capacity within the proceedings because of this action. Plaintiff's SSN, name and address is being used without authorization for location information. Trespass. The furnishing of deceptive forms with use of Trade name (SHARELLE MARIE WILSON) given protected material under threat, duress, and/or coercion. Defamation of Character by posting full name on public site without proper warrant, Posting Plaintiff's locating information for the public through various websites. Plaintiff has been harassed, threatened, and forced into an unknown contract unwillingly without full disclosure. No warrant or summons or affidavit has been provided only copies and some copies posted on ocn.net are different from what actors are posting to my door. Only a copy has been provided, which is not a true bill. If there is no true bill written under the penalty of perjury by the injured party, then this is evidence of fraud. That is a very serious injury to the Plaintiff being that equity is being withheld from the plaintiff. COUNTY of TULSA COURT did not provide copy of 1099 B or 1099 010. Plaintiff has provided numerous documentation at his own expense with state officials.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Plaintiff demands that the Court dismiss all allegations brought on by defendants. Plaintiff demands all private intellectual property, tangible and intangible be returned to the Plaintiff. Plaintiff requests that all attorney fees be paid by defendant for the relation to the work interacting within the pleadings. Plaintiff demands monetary restitution in accordance with fee schedule on file at county court house. Document will be made available at request. The man named Chris broke in and went through my personal IRS documents and certificates and mail to get my information to use against me without having any prior contract agreement or authorization to use any of it. Based on his criminal activity he has brought a frivolous claim against me in the name of someone else alleging to have landlord tenant relationship.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

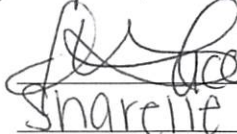
I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

06/30/21

Signature of Plaintiff

Printed Name of Plaintiff


06-1-308
Sharelle M Wilson

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

Attachment to Complaint for Violation of Civil Rights

Section D Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under Bivens, explain how each defendant acted under color of federal law. Attach additional pages if needed

Incompetence, negligence, and/or criminality of Judge Deborah Ludi Leitch making a judgment without a required prerequisite due process hearing under codes pursuant to allegations after being made aware of my request and shown the statute that governs this case. [42 U.S.C 1453d(k)] Administration of property without rights or contract [cf. Grand Theft] Simulation of the legal process [Cf. Texas Penal Code - PENAL § 32.48] Unauthorized Practice of law [Cf. Oklahoma Rules of Professional Conduct 5.5] and A falsifies/forged forcible entry document by Tracey E Persons

Section C What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

I saw a man on my security camera broke into the home. I arrived at the home to open the door and realized the locks have been changed. The next day I go to change locks back and police showed up telling me that a neighbor called the police for a break-in. I advised him of the situation. My sister Whitney is a witness to all of this. A man shows up who matches the image from my security camera stating that he is the owner of the home. The police tell him that he cannot break in and change my locks, and he needs to handle this in court and allows me to finish changing the locks back. A week later I see on my camera someone place something on my door, I check oscn.net and run my name to see that some entity by the name of B. Conner is claiming forcible entry and detainer that I had refused to pay rent and when asked to leave I refused. Unfortunately, I have never met anyone by the name B. Conner. The man that broke into my home introduced himself as Chris. The alleged summons that was placed on my door had numerous false statements and did not come with an affidavit which it states it did come with one. After looking up the Oklahoma code for forcible entry §21 -1351. I see that my right to due process was violated as it states that a required Administrative hearing must be done prior to any district court proceedings. I put this information on the record as well as hand-delivered copies of these findings to prevent any unlawful ruling. A few days later checking oscn.net I find they conducted this hearing in district court completely ignoring Oklahoma and HUD statutes and codes meanwhile using those codes against me without proof of authorization to use HUD codes pursuant to 48 USC § 52.212-5.